



**DEPARTMENT OF THE NAVY**  
ENGINEERING FIELD ACTIVITY, WEST  
NAVAL FACILITIES ENGINEERING COMMAND  
900 COMMODORE DRIVE  
SAN BRUNO, CALIFORNIA 94066-2402

N00236.001129  
ALAMEDA POINT  
SSIC NO. 5090.3

IN REPLY REFER TO:  
5090  
Ser T4NAS/001  
October 24, 1994

Mr. Tom Lanphar  
Project Manager  
State of California Environmental Protection Agency  
Department of Toxic Substance Control, Region 2  
Site Mitigation Branch  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710

**Subject: Identification of State "Applicable" or "Relevant and Appropriate" Requirements (ARARs) for the Remedial Investigation and Feasibility Study (RI/FS) at Naval Air Station Alameda**

Dear Mr. Lanphar:

Pursuant to our previous discussions and consistent with §V.A.2.c of August 1, 1990, Memorandum of Understanding Between the Department of Health Services, the State Water Resources Control Board, and the Regional Water Quality Control Boards for the Cleanup of Hazardous Waste Sites, we are hereby requesting that the Department of Toxic Substances Control, as the lead agency for the State of California, identify potential State chemical-specific and location-specific ARARs for Operable Units (OUs) 1, 2, 3, and 4 [Installation Restoration (IR) Sites 1, 2, 3, 4, 5, 6, 7A, 7B, 7C, 8, 9, 10A, 10B, 11, 12, 13, 14, 15, 16, 17, 18, 19, and 20].

Preliminary site characterization data for the OUs (23 IR Sites) listed above has been provided to you in the documents listed on Attachment A. In addition, the recent investigations that have been conducted are listed; data for these recent investigations has not been presented in a report, but has been discussed at several Technical Progress Review meetings since January of 1993. The site characterization data should allow you to begin to identify, with some specificity, State chemical-specific and location-specific ARARs. Please note that a similar request for action-specific ARARs will be transmitted after remedial alternatives have been screened and developed for the Detailed Analysis of Alternatives phase of the FS.

Timely identification of potential State ARARs is required under Section 121(d) (2) (A) of CERCLA and under the National Contingency Plan (NCP), 40 CFR §§300.400(g) and 300.515(d) & (h). Experience to-date has shown that a timely identification of ARARs enhances the timely implementation of remedial action. To ensure timely and complete ARARs identification, for each individual OU listed, above please include the following information:

1. A specific citation to the statutory or regulatory provision(s) for the potential State ARAR and the date of enactment or promulgation.
2. A brief description of why the potential State ARAR is applicable or relevant and appropriate to the particular OU (or IR Site).
3. A description of how the potential State ARAR would apply to potential remedial action, including: specific numeric discharge, effluent, or emission limitations; hazardous

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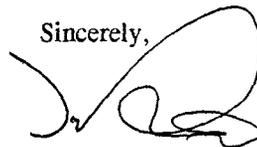
substance/constituent action or cleanup levels; etc., if the State intends to take the position that the potential State ARAR includes such limitations, levels, etc.

4. If the State believes its proposed ARAR is more stringent than the corresponding Federal ARAR, please provide the rationale and technical justification for this position.
5. If the State determines that there is not enough information to fully respond to our request, please identify any additional information that would be required to support identification of State ARARs and their application.

Consistent with 40 CFR §300.515 (h)(2), we are requesting a response within 30 days of your receipt of this request. After receiving your response we may wish to discuss it at a meeting. Please direct any technical questions that you may have concerning this request to the undersigned at (510) 263-3726, and any legal questions to Nicholas Bollo or Marvin Norman at (415) 244-2100.

Thank you for your efforts in this important endeavor.

Sincerely,



M. L. PETOUHOFF  
Lieutenant Commander  
Civil Engineer Corps, US Navy  
BRAC Environmental Coordinator  
By direction of  
the Commanding Officer

copy to:  
James Ricks, USEPA, Region IX  
James Nusrata, RWQCB, San Francisco Region

**ATTACHMENT A**  
**Naval Air Station Alameda**  
**Site Characterization Documents/Activities**

- Data Summary Report, RI/FS Phases 1 & 2A, Final, Volume I and II dated August 25, 1993.
- Data Summary Report, RI/FS Phases 2B and 3, Final, Volume 1 and 2, dated October 27, 1992.
- Data Summary Report, Background and Tidal Influence Study and Additional Work at Sites 4 and 5, Draft Final Volume 1 and 2, dated April 4, 1992.
- Solid Waste Water Quality Assessment Test (SWAT) and Data Summary Report for Phase 5 and 6, Final, Volume I and II, dated April 30, 1993.
- Final Fuel Spill Investigation Report, dated March 30, 1992.
- Final Intermediate Maintenance Facility Field Investigation Report, dated June 17, 1993.
- Draft Report Ecological Assessment, Volume I through V, dated February 17, 1994.
- Draft Report Amendment, Ecological Assessment, Updated SVOC Data, dated July 1, 1994.
- Removal Action Site 15 Transformer Storage Area, Final Implementation Work Plan, dated August 29, 1994.
- Data from follow-on field work conducted at Sites 4, 5, 8, 10A, 12, and 14. Work conducted between November 1993 and May 1994; quarterly groundwater sampling ongoing.
- Data from follow field work conducted at Sites 1, 2, 3, 4, 6, 7A, 7B, 7C, 9, 10A, 10B, 11, 13, 15, 16, and 19. Work started June 1994 and is ongoing; quarterly groundwater sampling for four quarters still to be conducted.